



BOULT ■ CUMMINGS  
CONNERS ■ BERRY PLC

Henry Walker  
(615) 252-2363  
Fax: (615) 252-6363  
Email: hwalker@boultcummings.com

REC'D TN  
REGULATORY AUTH

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OFFICE OF THE  
EXECUTIVE SECRETARY

January 25, 2002

David Waddell, Esq.  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: All Telephone Companies Tariff Filings Regarding Reclassification of Pay  
Telephone Service as Required by FCC Docket No. 96-128  
Docket No. 97-00409

Dear David:

Please find enclosed an original and thirteen copies of the Fourth Set of Data Requests from Tennessee Payphone Owners Association to Sprint/United Telephone-Southeast, Inc. in the above-captioned proceeding.

Copies have been forwarded to parties.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker*  
Henry Walker *HW*

HW/nl  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE: ALL TELEPHONE COMPANIES TARIFF FILINGS REGARDING  
RECLASSIFICATION OF PAY TELEPHONE SERVICE.**

**Docket No. 97-00409**

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**FOURTH SET OF DATA REQUESTS FROM THE TENNESSEE PAYPHONE  
OWNERS' ASSOCIATION TO SPRINT/UNITED TELEPHONE-SOUTHEAST, INC.**

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In an effort to expedite the discovery process in this case, subject matter expects representing both the Tennessee Payphone Owners Association ("TPOA") and Sprint/United Telephone-Southeast, Inc. ("Sprint/United") have engaged in direct talks concerning the remaining information TPOA needs to complete its analysis of Sprint/United's most recent cost study. As a result of those discussions, Sprint/United has agreed to provide answers to the following supplemental discovery requests. This should resolve all remaining discovery disputes except for the issue of PTAS-specific (as opposed to payphone-specific) loop lengths and investment. If the parties are unable to resolve that issue, it will be addressed in a separate filing.

1. Refer to file *TN PP 10-01 Inputs\_4b.xls*. Provide complete supporting documentation for the values in the *TN PP 10-01 Inputs\_4b.xls* file, and explain why Sprint chose to change these input values for the October 10, 2001 study.

**RESPONSE:**

2. Refer to the electronic copy of October 10, 2001 Payphone Cost Study, file TN Payphone 10\_10\_01/Payphone Study geocode\_USF ROR/8 INPTNUSF.xls, tab "loop", rows 57-80. Provide the following information:

- a. For each wire center in column E, provide a listing of the grids that are mapped to that wire center.
- b. For each grid identified in part a., provide the total number of 2-wire voice grade lines in that grid (consistent with the information presented in column J).
- c. For each grid identified in part a., provide the total C&WF Investment for that grid (consistent with the information presented in column K).
- d. For each grid identified in part a., provide the total Circuit Investment for that grid (consistent with the information presented in column L).
- e. For each grid identified in part a., provide the total number of Payphone Lines in that grid (consistent with the information presented in column F).

**RESPONSE:**

3. Refer to the March 6, 2001 Payphone Cost Study, page 35 (entitled "Loop Monthly Cost (TELRIC)"). Provide the following information:

- a. For each wire center in Wire Center column, provide a listing of the grids that are mapped to that wire center.
- b. For each grid identified in part a., provide the total C&WF Investment for that grid (consistent with the information presented in the column entitled "C&WF Investment").

- c. For each grid identified in part a., provide the total Circuit Investment for that grid (consistent with the information presented in the column entitled "Circuit Investment").

**RESPONSE:**

4. Refer to the file TN Payphone 10\_10\_01/TN Payphone Oct 2001 comparisons/TN Avg Loop Length. Explain in detail how the values in the columns Avg Payphone Loop Length (column B) and Avg Loop Length (column C) were developed.

- a. Based on this methodology, will each loop assigned to a given grid have the same reported length? Explain in detail why this would or would not be the case.

**RESPONSE:**

5. Refer to the electronic copy of the October 10, 2001 Payphone Cost Study, file TN Payphone 10\_10\_01/Payphone Study geocode\_USF ROR/8 INPTNUSF.xls, tab "loop", rows 57-80.

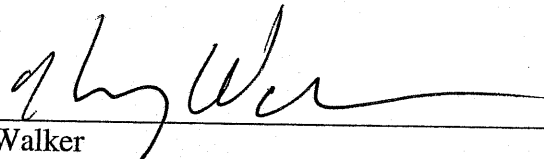
- a. Please identify any differences in the network facilities and equipment used to develop the C&WF Investment for Payphone Lines versus other 2-wire analog lines. If any payphone-specific facilities or equipment are included, please identify this payphone-specific equipment (including manufacturer and model number), identify its location in file *TN PP 10-01 Inputs\_4b.xls*, and describe in detail the function of this equipment.
- b. Please identify any differences in the network facilities and equipment used to develop the Circuit Investment for Payphone Lines versus other 2-wire analog lines. If any payphone-specific facilities or equipment are

included, please identify this payphone-specific equipment (including manufacturer and model number), identify its location in file *TN PP 10-01 Inputs\_4b.xls*, and describe in detail the function of this equipment.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: \_\_\_\_\_

  
Henry Walker  
414 Union Street, Suite 1600  
P.O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363


Counsel for Tennessee Payphone Owners Association

### CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2002, a copy of the foregoing document was served on the parties of record, via U.S. Mail, addressed as follows:

James Wright, Esquire  
United Telephone-Southeast  
14111 Capitol Blvd.  
Wake Forest, NC 27587

Tim Phillips, Esq.  
Consumer Advocate Division of the Attorney General's Office  
426 5<sup>th</sup> Ave., North, 2<sup>nd</sup> Floor  
Nashville, TN 37243

  
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Henry Walker